

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RA'ED MOHAMMAD IBRAHIM MATAR, on
behalf of himself and his deceased wife Eman
Ibrahim Hassan Matar, and their deceased
children Ayman, Mohamad and Dalial;
MAHMOUD SUBHAI AL HUWEITI, on
behalf of his himself and his deceased wife
Muna Fahmi Al Huweiti, their deceased sons
Subhai and Mohammed, and their injured
children, Jihad, Tariq, Khamis and Eman; and
MARWAN ZEINO on his own behalf,

Plaintiffs,

vs.

AVRAHAM DICTER, former Director of
Israel's General Security Service,

Defendant.

Civil Action No. 05 CV 10270 (WHP)
ECF Case

DEFENDANT AVRAHAM
DICTER'S NOTICE OF MOTION
TO DISMISS THE COMPLAINT

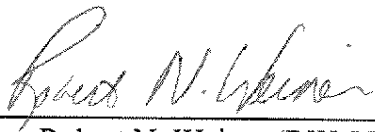
PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jean E. Kalicki, dated February 22, 2006, the accompanying Memorandum of Points and Authorities in Support of Avraham Dichter's Motion to Dismiss the Complaint, dated February 22, 2006, the accompanying Appendix of United States Government Court Submissions Cited in Defendant Avraham Dichter's Memorandum of Points and Authorities in Support of His Motion to Dismiss, and upon all prior pleadings and proceedings had herein, defendant Avraham Dichter, by his undersigned counsel, will move this Court on the 12th day of May, 2006 before the Honorable William H. Pauley III at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 11D, New York, New York 10007, for an order dismissing this action pursuant to F.R.C.P. 12(b)(1) and the Political Question and Act of State Doctrines and awarding such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, are due on or before April 10, 2006, and reply papers, if any, are due on or before May 3, 2006.

Dated: New York, New York
February 22, 2006

Respectfully submitted,

ARNOLD & PORTER LLP

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